

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

J.J. , by and through his next friend, Sakeena Jackson; <i>et al.</i> , for themselves and all others similarly situated, Plaintiffs, v. Jon E. Litscher , in his official capacity as Secretary of the Wisconsin Department of Corrections, <i>et al.</i> , Defendants.	Civil Action No. 17-CV-47
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PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65(a) of the Federal Rules Civil Procedure and the Western District of Wisconsin's Procedure for Seeking Injunctive Relief, Plaintiffs, by and through their undersigned counsel, respectfully ask this Court to grant Plaintiffs' Motion for Preliminary Injunction.

Plaintiffs request a preliminary injunction ordering Defendants and their agents to: (1) eliminate the use of solitary confinement for disciplinary or punitive purposes, and limit any removal of youth from the general population to rare and temporary responses to prevent imminent and serious physical harm to persons; (2) eliminate the routine use of mechanical restraints, including handcuffing juveniles in solitary confinement to a waist belt and tethering youth to a table during their only time out of their cells, and limit all mechanical restraint use within the institution to rare and temporary responses necessary to prevent imminent and serious physical harm to persons or during transportation outside the institution; and (3) eliminate the

use of pepper spray for punishment and behavior management or control, and limit any use of such chemical agents to rare and temporary responses necessary to prevent imminent and serious physical harm to persons. Each of these practices violate Plaintiffs' and class members' rights under the Eighth and Fourteenth Amendments to the United States Constitution.

In support of this Motion, Plaintiffs concurrently submit a Brief in Support of the Motion, Proposed Findings of Fact, and the Declarations of Vincent Schiraldi, Stuart Grassian, J.J., K.D., C.M., R.N., M.S., A.V., M.R., S.K., A.P., and Rachel A. Graham.

Dated this 19th day of April, 2017.

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of April, 2017, I filed the foregoing Plaintiffs' Motion for Preliminary Injunction using the CM/ECF system, which will send electronic notification of such filing to all counsel of record who are ECF participants. I further certify that on said date, paper copies were sent to those indicated as non-registered ECF participants, via First Class, United States mail, postage prepaid.

/s/ Zachary T. Eastburn